



with Section 3.2(d) of the Settlement Agreement (rather than 84 calendar days prior to the Final Hearing, as stated in the Preliminary Approval Order, ¶9); and require the Claims Administrator, and not defendant, to submit a declaration containing a sworn verification of the mailing of notice (¶4).

Attached as Exhibit 1 to this filing is a revised proposed Order, which corrects these small differences. Attached as Exhibit 2 is a redline version of the revised proposed Order which shows the differences between the proposed Order and the February 9, 2016, Order entered by the Court. These changes conform the Order to the Settlement Agreement (Dkt. No. 91) and should not affect the hearing date of June 2, 2016, selected by the Court.

The existing Order requires the Short Form Notice to be distributed within 21 days of February 9, 2016, or by March 1, 2016. We intend to finalize the Short Form Notice using the dates included in the Revised Proposed Preliminary Approval Order (e.g., setting a deadline to file a Claim Form or object by May 10, 2016).

Additionally, Defendant has informed Plaintiffs that the Welcome Procedure Letter attached as Exhibit A to the Settlement Agreement (and filed as ECF No. 91-1) has been updated to reflect certain changes to Defendant's procedures. Attached as Exhibit 3 to this filing is an updated version of the Settlement Agreement Exhibit A that supersedes the prior filing at ECF No. 91-1.

Plaintiffs respectfully request that the Court enter a revised Order pursuant to this motion.

Dated: February 12, 2016

Respectfully submitted,

/s/ William B. Federman

William B. Federman (OBA #2853)

**FEDERMAN & SHERWOOD**

10205 North Pennsylvania Avenue

Oklahoma City, Oklahoma 73120

Tel: (405) 235-1560

Fax: (405) 239-2112

[wbf@federmanlaw.com](mailto:wbf@federmanlaw.com)

-and-

Patricia I. Avery (admitted *pro hac vice*)

Robert C. Finkel (admitted *pro hac vice*)

Matthew Insley-Pruitt (admitted *pro hac vice*)

**WOLF POPPER LLP**

845 Third Avenue, 12th Floor

New York, NY 10022

Tel: (212) 759-4600

Fax: (212) 486-2093

[pavery@wolfpopper.com](mailto:pavery@wolfpopper.com)

[rfinkel@wolfpopper.com](mailto:rfinkel@wolfpopper.com)

[minsley-pruitt@wolfpopper.com](mailto:minsley-pruitt@wolfpopper.com)

*Counsel for Plaintiffs*

**CERTIFICATE OF SERVICE**

I hereby certify that on February 12, 2016, I caused the foregoing to be electronically filed with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the email addresses denoted on the Electronic Mail Notice List, and I hereby certify that I caused the foregoing document or paper to be mailed via the United States Postal Service to the non-CM/ECF participants indicated on the Manual Notice List.

/s/ William B. Federman

William B. Federman